

EXHIBIT F

*Sioux Steel Company v.
KC Engineering, P.C.*

Chad Kramer, PE
September 29, 2016



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<p style="text-align: right;">Page 37</p> <p>1 A We don't have that software, no.</p> <p>2 Q So when you did your design, you didn't have the</p> <p>3 benefit of the RISA model?</p> <p>4 A No.</p> <p>5 Q Within the scope -- or below the scope, KC Engineering</p> <p>6 lists out some standards that they are going to use or</p> <p>7 reference in their review.</p> <p>8 Did you have any concern at the time in July of</p> <p>9 2012 about any of those particular references or</p> <p>10 standards?</p> <p>11 A No.</p> <p>12 Q In fact, if I remember correctly, they're probably some</p> <p>13 of the same that you already told me that you were</p> <p>14 using when you did your design?</p> <p>15 A Yes.</p> <p>16 Q As you sit here today, do you have any problem with</p> <p>17 those four referenced standards?</p> <p>18 A I do not.</p> <p>19 Q And maybe I already asked this -- and if I did forgive</p> <p>20 me -- but you told me that no calculations were sent to</p> <p>21 KC Engineering, correct?</p> <p>22 A Correct.</p> <p>23 Q And why was that? Why were no calculations sent to</p> <p>24 KC Engineering?</p> <p>25 MR. GOODSSELL: I'm going to object to the</p>	<p style="text-align: right;">Page 39</p> <p>1 A Yes.</p> <p>2 Q Who is Tim?</p> <p>3 A Tim is an R&D lab technician.</p> <p>4 Q At that time was Tim a Sioux Steel employee?</p> <p>5 A Yes.</p> <p>6 Q And then the other name is Chuck. Who is Chuck?</p> <p>7 A Chuck is part of operations and does bills of</p> <p>8 materials.</p> <p>9 Q And obviously he would have been a Sioux Steel employee</p> <p>10 at the time as well?</p> <p>11 A Yes.</p> <p>12 Q Are those three gentlemen still with Sioux Steel today?</p> <p>13 A Yes.</p> <p>14 Q Did any -- from previous answers I think I know that</p> <p>15 the answer is no, but those gentlemen would not have</p> <p>16 played any role in the design -- in your design of the</p> <p>17 hopper bin at issue?</p> <p>18 A No.</p> <p>19 Q It appears to me from these engineering reports that in</p> <p>20 the summer of 2012 -- and now we're into August per</p> <p>21 this engineering report -- that Sioux Steel is going</p> <p>22 forward with the actual manufacture of these hopper</p> <p>23 bins. Is that accurate?</p> <p>24 A We are preparing for the manufacture of the hopper</p> <p>25 bins, yes.</p>
<p style="text-align: right;">Page 38</p> <p>1 question. It's been asked and answered.</p> <p>2 You can go ahead.</p> <p>3 THE WITNESS: I don't know why the calculations</p> <p>4 weren't sent. They weren't asked for. We weren't</p> <p>5 asked to provide calculations.</p> <p>6 (Exhibit 8 is marked for identification.)</p> <p>7 BY MR. TOBIN:</p> <p>8 Q Chad, I'm going to hand you what's been marked as</p> <p>9 Exhibit 8, and Exhibit 8 is another weekly engineering</p> <p>10 report from you to Chris Nelson, correct?</p> <p>11 A Yes.</p> <p>12 Q And this one is from August 10 of 2012?</p> <p>13 A Yes.</p> <p>14 Q On the second page under the hopper bins you note that</p> <p>15 KC Engineering is in the process of their design</p> <p>16 review?</p> <p>17 A Yes.</p> <p>18 Q And then you note some work that's being done, and I</p> <p>19 just want to have a quick discussion about that.</p> <p>20 The first name you reference is Gary. Who is</p> <p>21 Gary?</p> <p>22 A Gary is a designer or drafter.</p> <p>23 Q Was he at this time a Sioux Steel employee?</p> <p>24 A Yes.</p> <p>25 Q And then the next name is Tim?</p>	<p style="text-align: right;">Page 40</p> <p>1 Q What do you mean by you're preparing for the</p> <p>2 manufacture of the hopper bins?</p> <p>3 A Creating weld fixtures for operations to use.</p> <p>4 Q To your knowledge had any bins -- exemplar bins of any</p> <p>5 type been manufactured and produced during -- by or in</p> <p>6 August of 2012?</p> <p>7 A I'm sorry. What type of bins?</p> <p>8 Q The hopper bins at issue, any sort of exemplar or any</p> <p>9 other type of hopper bins, had any been produced?</p> <p>10 A No.</p> <p>11 Q I guess what I'm driving at is -- and see if you agree</p> <p>12 with this or not: Sioux Steel was going forward with</p> <p>13 the manufacture of these bins and almost were not</p> <p>14 waiting necessarily for what KC Engineering has to say?</p> <p>15 A We were going down parallel paths of being prepared to</p> <p>16 manufacture.</p> <p>17 (Exhibit 9 is marked for identification.)</p> <p>18 MR. TOBIN: Why don't we take a short break if</p> <p>19 that's okay.</p> <p>20 MR. GOODSSELL: Sure.</p> <p>21 (Recess taken from 9:59 a.m. to 10:14 a.m.)</p> <p>22 BY MR. TOBIN:</p> <p>23 Q Before we turn to Exhibit 9, I just want to circle back</p> <p>24 to a few issues.</p> <p>25 The calculations. We were discussing</p>